UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 28 2002

SE-5J

VIA FACSIMILE (312) 280-7998 & (773) 728-0145
AND U.S. MAIL

Mr. Troy Imke
Mark Goodman & Associates
Olympia Centre
737 North Michigan Avenue, Suite 2350
Chicago, Illinois 60611

Ms. Laurie Bain
Bain Environmental
5315 North Clark, Suite 144
Chicago, Illinois 60640

Re: Kieffer Building,160 East Illinois, Chicago, Illinois

Dear Mr. Imke and Ms. Bain:

Since we first wrote you on September 8, 2000, the U.S. Environmental Protection Agency (USEPA) has sought data regarding radiological conditions in the "Kieffer Building" at 160 East Illinois, Chicago, Illinois, to determine if there might be public health or environmental concerns. This building is near the thorium contaminated Lindsay Light Building at 161 East Grand and in the Streeterville neighborhood of several other thorium contaminated sites linked to Lindsay Light operations. As a result, there is some potential for thorium contamination in this building.

We were furnished and reviewed copies of the Phase II Investigation / Radiological Survey, submitted on August 19, 2000, and the Phase II Investigation, Exterior Radiological Survey (undated, but survey was conducted on July 21, 2000). We observed borings in the sidewalks and the alley surrounding the building on August 16, 2000.

Based on that data, there are no stark indications of contamination, but, because of the limited data in some cases and unresolved questions on other data, we cannot conclusively determine if there are radiological issues or not. Thus, we cannot officially state the building shows no indications of contamination.

Specifically, our issues are:

- the interior radiological survey, almost totally, collected data in the vicinity of the exterior walls. Only three data points were collected for the central floor area, which constitutes the predominant area in the building. Thus, there is no data for most of the floor space in the building;

- the cause of elevated readings on the 6th floor was attributed to naturally occurring thorium, commonly associated with brick. However, thorium is the contaminant of concern. The area investigated was not near brick and it was not explained how a determination was made that the cause was "natural;"

- readings in the alley north of the building were elevated in the surface layer when USEPA observed your investigations on July 21, 2000, but this data was not mentioned in your report. One explanation for the elevated readings is thorium contamination;

- soil samples taken from all 6 boreholes outside the building were not taken at the location of highest gamma meter readings as the Methodology specified. Thus, maximal soil concentrations may be higher than concentrations reported;

- soil samples were taken from 2 foot cores, not 6 inch cores that correspond to the USEPA' s regularly used cleanup criterion. Thus, soil concentrations could be diluted with regard to the cleanup criterion; and

- it was not clear if soil samples were sifted through a quarter inch screen as USEPA does in Streeterville projects. If soil was allowed to retain larger objects, the measured soil concentrations by be too low.

USEPA would like to resolve these remaining issues associated with your building to enable us to determine that there are no indications of radiation contamination at your building. We think it would benefit us all if this was accomplished expeditiously.

Please contact me at (312) 886-3601 or the other On-Scene Coordinator, Fred Micke at (312) 886-5123 to discuss how we can reach this desirable condition.

Sincerely,

Verneta Simon

Verneta Simon
On-Scene Coordinator
Emergency Response Section #3

cc: Naren Prasad, City of Chicago - Department of Environment
Benet Haller, City of Chicago - Department of Planning and Development

bcc: Mary Fulghum C-14J,
Larry Jensen, SE-5J
Mike Joyce, P-19J
Padma klejwa, C-14J
Fred Micke, SE-5J
Linda Nachowicz, SE-5J
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